

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)**

BALTIMORE COUNTY BRANCH OF THE
NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE,
et al.,

Plaintiffs,

v.

BALTIMORE COUNTY, MARYLAND,
et al.,

Defendants.

Civil Action No. 1:21-cv-03232-LKG

**DEFENDANT BALTIMORE COUNTY’S
MOTION FOR APPROVAL OF PROPOSED REDISTRICTING MAP
AND TO MODIFY PRELIMINARY INJUNCTION¹**

Defendant Baltimore County, Maryland (“Baltimore County” or the “County”), in accordance with the Court’s Memorandum Opinion and Order (ECF 55), hereby submits its Motion for Approval of Proposed Redistricting Map and to Modify Preliminary Injunction (the “Motion”). The grounds and authorities supporting this Motion are set forth in the attached Memorandum of Law and Exhibits, which are referred to and incorporated herein. Baltimore County also incorporates herein the arguments set forth in its Opposition to Plaintiffs’ Motion for Preliminary Injunction (ECF 34) and related exhibits, Notice of Supplemental Authority (ECF 42), Notice Regarding Witnesses (ECF 45) and related exhibits, the exhibit provided to the Court from

¹ Although the Court’s Case Management Order (ECF 5) sets forth a general procedure for filing Pre-Motion Notices, Baltimore County understands the Court’s Memorandum Opinion and Order (ECF 55) as directing the County to file this Motion appending the proposed redistricting map.

the February 15, 2022 hearing (ECF 52), and arguments of counsel and testimony during the February 15, 2022 hearing (ECF 54).

WHEREFORE, the Court should grant the County's Motion and issue an Order:

1. Approving the new proposed redistricting map;
2. Extending the deadline for the Council to adopt a final redistricting plan as Section 207(c) of the Baltimore County Charter required the Council to do so by January 31, 2022, and that date has now passed;
3. Modifying the Preliminary Injunction to allow the Council to follow the requirements of the Baltimore County Charter to pass the Draft Redistricting Bill, thus allowing the new proposed redistricting map to be enacted into law; and
4. Further modifying the Preliminary Injunction to allow the County to conduct the 2022 election cycle and those following it pursuant to the passed redistricting bill.

[signatures on following page]

Dated: March 8, 2022

Respectfully submitted,

/s/ Ava E. Lias-Booker

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